

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE PR/USPS-11**
(June 15, 2012)

The United States Postal Service files this partial objection to the above-identified Interrogatory to witness Jeffrey C. Day of the Public Representative filed on June 8, 2012. The objectionable portion of the interrogatory is stated verbatim and followed by a statement of the basis for the objection.

PR/USPS-T1-11.

Based on the results of surveying 1,024 customers, the Postal Service asserts that communities will prefer to keep local Post Offices open with realigned hours. USPS-T-1 at 19-20.

The Postal Service objects to the interrogatory in part because the preamble misstates and misrepresents the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1). Specifically, witness Day's testimony contains the following statement on pages 19-20 of his testimony:

Based on prior experience and market research, the Postal Service expects that most communities will prefer that Post Offices remain open with realigned hours. In fact, market research indicates that a majority of customers prefer maintaining their Post Office with realigned hours to other service alternatives.

Contrary to witness Day's testimony, the preamble does not acknowledge that the Postal Service considered prior experience, as well as the market research. Further, the preamble overstates the testimony by not acknowledging that witness Day's statements were made in regard to "most communities" and "a majority of customers."

As a result, the preamble implies that the Postal Service asserted that *all* communities will prefer to keep local Post Offices open with realigned hours.

Nonetheless, the Postal Service will respond to the above identified interrogatory.

Respectfully submitted,

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